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Counsel for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
DOCUMENTS (DKT. 399)**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I make
4 this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I
5 could and would testify competently thereto.

6 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney
7 for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt.
8 399.

9 3. On February 8, 2022, Plaintiffs filed an administrative motion to file under seal
10 portions of the Joint Letter Brief Re: Plaintiff’s Request for an Additional Google Custodian (Dkt.
11 399). On February 13, 2022, I received an unredacted service copy of these documents. .

12 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil
13 Local Rule 79-5, unredacted versions of which have been filed at Docket Entry 399. Based on my
14 review, there is good cause to seal the following information:

Document	Basis for Sealing
15 Joint Letter Brief Re: Plaintiff’s 16 Request for an Additional Google 17 Custodian (Dkt. 399-1) 18 Pages 1-3 19 20 21 22 23 24 25 26	The information requested to be sealed contains Google’s highly confidential and proprietary information, regarding highly sensitive features of Google’s internal systems and operations, including details related to internal projects, identifiers, metrics, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cyber security threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.

1 Google's request is narrowly tailored in order to protect its confidential information. These
2 redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored
3 and limited to portions containing Google's highly-confidential or confidential information, Google
4 requests that the portions of the aforementioned documents be redacted from any public version of
5 those documents.

6 I declare under penalty of perjury of the laws of the United States that the foregoing is true
7 and correct. Executed in San Francisco, California on February 15, 2022.

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9 DATED: February 15, 2022

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

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11
12 By /s/ Jonathan Tse
13 Jonathan Tse
14 *Attorney for Defendant*
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